

March 12, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Cox Georgia Telcom, LLC, *Petition for Approval of Redefinition of the Service Area of Windstream Georgia, L.L.C. in the State of Georgia*; WC Docket No. 09-197;  
Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92;  
High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135;  
Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51  
**Notice of Ex Parte Communication**

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Dear Ms. Dortch:

On March 8, 2012, the undersigned and Derek Teslik of Dow Lohnes PLLC, representing Cox Georgia Telcom, LLC ("Cox"), met with Alexander Minard and Robert Abb of the Wireline Competition Bureau. The discussion focused on Cox's *Petition for Approval of Redefinition of the Service Area of Windstream Georgia, L.L.C. in the State of Georgia*, filed July 6, 2011 in WC Docket No. 09-197. During the meeting, the participants discussed the impact of changes to the Universal Service Fund resulting from the *Connect America Fund Order*<sup>1</sup> on Cox's Petition and on the Commission's consideration of other petitions regarding redefinition of the service areas of rural ILECs pursuant to section 215(e)(5) of the Communications Act of 1934, as amended. Cox explained that because of the elimination of the identical support rule and the calculation of high cost support based on geographic areas other than a rural ILEC's service area,

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<sup>1</sup> Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; and Universal Service Reform - Mobility Fund, *Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17663 (2011) ("*Connect America Fund Order*").

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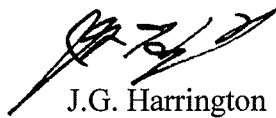
there is no potential for "creamskimming" under the new rules. Therefore, the Cox petition should be granted.

In addition, the participants discussed the need for modification of the current redefinition rules. Cox suggested that the framework for consideration of service area redefinition petitions should be modified to eliminate consideration of creamskinning issues and that the Commission should consider forbearance from the redefinition requirement.

In accordance with the requirements of Section 1.1206 of the Commission's rules, an original and one copy of this notice are being filed by the end of the second business day following the meeting and copies of this notice are being provided to the Commission attendees.

Please contact the undersigned should you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J.G. Harrington", is written over a horizontal line.

J.G. Harrington  
*Counsel to Cox Georgia Telcom, LLC*

cc: Alexander Minard  
Robert Abb